<u>REMARKS</u>

The Applicant respectfully submits this Amendment And Request For Reconsideration in response to the Office Action mailed on 15 March 2007 for the above-referenced patent application.

The present Amendment amends claims 1, 9-10, 1, 19-20, 21, and 29-30, as well as corrects a paragraph in the specification. Therefore, claims 1-30 as amended are pending for examination. No new matter has been entered in this submission; the changes are fully supported in the application as originally filed. The Applicant respectfully requests reconsideration of the claims and application in light of this submitted Amendment.

In the Office Action of 15 March 2007, the Examiner objected to the specification based on a typographical error. In response, the Applicants amend such paragraph in the specification as provided in order to clarify and conform the specification.

In the same Office Action, the Examiner objected to claim 1 and 21 for a few informalities. In response, the Applicants have amended claims 1 and 21 to correct such formalities.

In the same Office Action of 15 March 2007, the Examiner rejected claims of the specification under 35 U.S.C. § 102 based on Gopiknath (U.S. Patent Application Publication No. US 2003/0129971A1), and under 35 U.S.C. § 103 in view of other references including Shoaib (U.S. Patent No. 7,161,914 B2), Matta et al. (U.S. Patent Application Publication No. US 2003/0069018A1), Jouppi et al. (U.S. Patent Application Publication No. US 2002/0177413A1), and Guilford et al. (U.S. Patent Application Publicatoin

No. 2002/0087674A1). In response, the Applicants respectfully disagree with the Examiner's rejection and submit that all claims are allowable for at least the following reasons.

For proper rejections under § 102 and § 103, the prior art (alone or in combination) must teach or suggest each and every limitation of the claims. In the present case, the prior art fails to teach or suggest each and every limitation of the claims.

In particular, the prior art in combination fails to teach or suggest "a plurality of network selection tables" that are maintained in memory, where each network selection table corresponds to "one of a plurality of traffic classes associated with quality of service criteria and including a plurality of system identifications" (see e.g. claim 1). In addition, the Examiner has failed to establish any prima facie case of anticipation or obviousness, since there has been a failure to demonstrate or articulate any teaching in the prior art that meets such limitations.

The claims of the present application recite the use of "a plurality of network selection tables." The Applicants do not claim use of merely any single list or table – but rather claim network selection tables. As one ordinarily skilled in the art would readily appreciate, a network selection table is one that includes a plurality of system identifications corresponding to a plurality of wireless networks which are prioritized in an order of selection preference, typically in advance. Further, a network selection table is utilized in connection with a scan list of available wireless networks within a current coverage region of a mobile device, for its selection of the most preferred available wireless network at any given time. Any other unsuitable interpretation of "network selection table" would be unreasonable.

In connection with such "network selection table" limitations, the prior art further fails to teach or suggest the technique of "causing a network selection method to be performed in accordance with the selected network selection table in attempt to identify one of the available wireless communication networks that grants service needed for the executed software application, where network selection preference for the network selection method is based the priorities of the plurality of system identifications in the selected network selection table."

Gopikanth, as well as the other prior art of record, fail to teach or suggest the limitations associated with use of the plurality of network selection tables. In contrast, the table in FIG. 3 of Gopikanth is merely a scan list and not a network selection table. Again, a scan list merely reflects those available wireless networks within a current coverage region of a mobile device. Even if the scan list of FIG. 3 were characterized (albeit improperly) as a network selection table, there would only a single such table in FIG. 3 of Gopikanth, as each such table is required to include "a plurality of system identifications" as recited in the claims (i.e. not just a single system identification). Further, each system identification entry in such table should have "a priority for selection" as recited in the claims but, in Gopikanth, the scan list has no such priority for selection.

Although the technique of the present application may indeed utilize a scan list as well (e.g. when the technique involves "scanning to identify a plurality of wireless communication networks in a coverage area of the mobile communication device"), Gopikanth as well as the other remaining prior art fail to teach or suggest the use of a plurality of network selection tables as claimed.

Using conventional techniques, problems may arise when different types of data applications are utilized by the mobile device. If a mobile

device is operating in home network coverage, it is not guaranteed that its application requirements will be met. For example, a streaming traffic class application which requires a high bandwidth will not work if the mobile device's current network provides only a low bandwidth. As another example, a mobile device under weak signal coverage (typically resulting in high packet data loss) may serve background traffic class applications well but not interactive traffic class applications (e.g. an interactive video game). Furthermore, two different carriers may have a voice roaming agreement but not a data roaming agreement. In this case, a non-home foreign network suitable for voice may not be suitable for a data application at all. Even if a data roaming agreement existed between these carriers, the home carrier may still prohibit mobile devices from roaming onto the foreign network in cities where it provides system coverage itself. When a data call is attempted on such a foreign network, authentication failures typically occur as a result. This wastes network resources and battery life and gives the end user a poor service experience.

Advantageously, the present technique which utilizes multiple network selection tables for multiple software applications as claimed overcome such prior art deficiencies.

Reasons for further allowability based on additional limitations associated with both the independent and dependent claims are apparent to those ordinarily skilled in the art but are not elaborated on at the present time due to the already indicated reasons for allowability.

Based on the above, the claims as amended are novel and non-obvious over the prior art of record. The Applicants respectfully submit that the application is now in a condition suitable for allowance. Thus, the

Applicants respectfully request the Examiner to withdrawn the rejections and allow the application as appropriate.

Thank you. The Examiner is invited to contact the undersigned if necessary to expedite this matter.

Respectfully Submitted,

/John J. Oskorep/

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